

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	No. 1:19-cr-59
)	
DANIEL EVERETTE HALE,)	Hon. Liam O’Grady
)	
Defendant.)	

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY BRIEFS**

COMES NOW the defendant, Daniel Hale, through counsel, and moves this Honorable Court for a four-day extension of time for both parties to file reply briefs in support of pending motions. Defense counsel has consulted with counsel for the United States, who does not oppose this Motion. In support of this Motion, defendant states as follows:

1. On the motion-filing deadline set by this Court, September 16, 2019, both parties filed a number of motions in this matter, which is set for a motion hearing on October 18, 2019 and trial on March 16, 2020. *See* Dkt. # 49-58. On September 30, 2019, both parties filed responses to those Motions. *See* Dkt. # 67-74.

2. The parties anticipate filing replies in support of some or all of the pending Motions. Given counsels’ other obligations, both parties are requesting a brief extension of time within which to file such replies, which are due under the Local Rules on October 7, 2019. Specifically, the parties request a four-day extension of time through October 11, 2019 within which to file reply briefs.

3. As noted, the government does not oppose this Motion.
4. For the Court's convenience, a proposed Order is submitted with this Motion.

Respectfully Submitted,

DANIEL EVERETTE HALE
By Counsel,

Jeremy C. Kamens
Federal Public Defender

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2019, I filed the foregoing via the CM/ECF system, which will electronically serve a copy upon all counsel of record.

/s/

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